

CERTIFIED MAIL – RECEIPT REQUESTED

April 24, 2001

United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

Attn: Mr. Partick F. Kuefler

Re: LTV Steel Indiana Harbor Works
Notice of Violation
Compliance Evaluation Inspection (June 19 – July 1)
EPA I.D. Number: IND 005 462 601

Dear Mr. Kuefler:

LTV Steel Company Inc. (LTV Steel) is providing this correspondence and attachments in response to the U.S. EPA's Notice of Violation, received on March 28, 2001, from the compliance evaluation performed from June 19 through July 1, 2000. The following discussion presents each alleged violation and LTV Steel's specific response.

1 329 IAC 3.1-7-1/40 CFR 262.11 - Failure to properly characterize the following solid wastes to determine if they are hazardous wastes as required. Overall the wastes listed below make up very small volume of the waste generated at the facility

- (a.) Three 55-gallon containers of unknown waste material located near the carpentry shop.*
- (b.) Five 55-gallon and one 30-gallon containers of unknown waste material located within the seamless pipe mill.*
- (c.) Paint booth filters from the electric shop.*
- (d.) Burn-off oven residue from electric shop.*
- (e.) Blast Media from the electric shop.*
- (f.) Partially spent aerosols from electric shop.*
- (g.) Waste batteries located near the carpenter shop.*
- (h.) Waste analyzed for Central Treatment Plant IHW # 73-37 exceeded holding times.*

Response

Upon discovery during the inspection, LTV Steel immediately took action to characterize and manage each material in accordance with applicable regulations. The specific actions performed are as follows:

- (a.) Three 55-gallon containers of material located near the carpentry shop were evaluated for waste characterization purposes. Samples were collected on 6/28/00. The analytical results for each drum indicated the oily materials were non-hazardous solid waste. Copies of the analytical results are provided as **Attachment 1**. The waste oils were subsequently recycled.

6. 329 IAC 3.1-10-1/40 CFR 265.56(j) LTV failed to provide a written report to the administrator following an incident of releases of hazardous wastes or hazardous waste constituents. At minimum, six spill events occurred since 1997 and no reports were filed.

- (a.) 3/28/00, FRFC - tanker overfill resulting in release of approximately 30 gallons of KO62.
- (b.) 6/14/98, FRF - tank rupture resulting in release of approximately 1,000 gallons of KO62.
- (c.) 7/15/98, #2 Tin Mill - equipment malfunction resulting in release of approximately 100 gallons of F007
- (d.) 4/8/97, #2 Tin Mill - Tin Line - equipment (temporary line became loose) malfunction resulting in a release of approximately 100 gallons of F007.
- (e.) 7/22/97, #2 Tin Mill - Tin Line - tank overflow resulting in release of approximately 10 gallons of F007
- (f.) 12/31/97, FRF - operator error resulting in release of approximately 500 gallons of KO62.

Response

The six spill events were reported as CERCLA events exceeding a reportable quantity. The events were non-emergencies that did not threaten human health or the environment outside the facility. A written report is not required.

7. 329 IAC 3.1-10-1/40 CFR 265.195(a)(2) Chrome side tank inspection to look for corrosion or releases of waste from the above ground portions of the tank was not conducted on 6/26/00 as required.

Response

The Chrome side tank in question was inspected on 6/24/00 and 6/26/00, with no leaks detected. A copy of the appropriate inspection log, containing the signature of the inspectors is provided as **Attachment 13**.

If you have any question concerning this correspondence or attachments, please do not hesitate to contact us.

Sincerely,
LTV STEEL COMPANY


Michael J. Thomas
Manager, Environmental Services
Indiana Harbor Works

Attachments

cc: Nancy Johnston (IDEM - Office of Enforcement)

2. 329 IAC 3.1-7-8/40 CFR 262.20(a) LTV failed to list all the characteristic hazardous wastes on a manifest IL 6432621. Silver not listed as required on Manifest IL 6432621.

Response

Manifest IL 6432621 pertains to shipment of waste chromic acid on 2/12/99. The analytical information used to characterize the waste shipment did not indicate that the waste exhibited the hazardous waste characteristic for silver. Therefore, it would have been inappropriate to cite silver on the manifest. A copy of pertinent analytical information, which spans the date of the hazardous waste shipment, is provided as **Attachment 9**.

3. 329 IAC 3.1-7-1/40 CFR 262.40(c)(2). LTV failed to retain a copy of waste analysis data for waste stream 73-39 (Lab Waste Solvent) and the remediation analytical data for a spill of F007 Tin line wash water 4/8/97.

Response

LTV Steel notes that 40 CFR 262.11 (c)(2) allows knowledge of the waste to be used for hazardous waste determinations. However 1998 and 2000 analytical information relative to waste stream 73-30 (Lab Waste Solvent) are provided in **Attachment 10**.

4. 329 IAC 3.1-10-1/40 CFR 265.16 LTV failed to provide hazardous waste training to Mr. Calihan as required by the facility-training plan.

Response

Mr. Calihan received hazardous waste training provided by the University of Findley on 9/11/00. Mr. Calihan has also been reassigned, and no longer has environmental management responsibilities at the Indiana Harbor Works. A copy of the training announcement and applicable attendance signatory sheet is provided as **Attachment 11**.

5. 329 IAC 3.1-10-1/40 CFR 265.54(d) LTV failed to update the list of emergency coordinators within its contingency plan. The emergency coordinators Coe and Anderson were replaced but the plan was not updated.

Response

The RCRA contingency plan emergency coordinator list was updated on 6/22/00. The updated plan was distributed to appropriate parties on 6/22/00. A copy of the updated plan and the distribution cover letters are provided as **Attachment 12**.

- (b.) The five 55-gallon drums and one 15-gallon tote of material located in the seamless pipe mill were individually evaluated for characterization purposes. Samples were collected on 7/5/00.

The analytical results for three of the 55-gallon drums and the 15-gallon tote indicate that the oily material does not exhibit a hazardous waste characteristic and were non-hazardous. Copies of the analytical results are provided as **Attachment 2**. The non-hazardous oils were subsequently recycled.

The Two (2) remaining 55-gallon drums appeared to be a type of paint thinner exhibiting hazardous waste characteristics. These two drums were over packed and transported by Clean Harbor Environmental Services, Inc. to Spring Grove Resource Recovery on 8/14/00. A copy of the analytical results and waste manifest IL 9246850 are also provided in **Attachment 3**.

- (c.) The paint booth filters were sampled for waste determination purposes. A sample was collected on 6/28/00. The analytical results indicate that the material can be managed as a non-hazardous waste. Copies of the analytical results are provided as **Attachment 4**.
- (d.) The ash that collects inside the electric shop-drying furnace was sampled for waste characterization purposes. A sample was collected on 6/28/00. The analytical results indicate that the ash is non-hazardous. Copies of the analytical results are provided, as **Attachment 5**.
- (e.) LTV Steel has not yet encountered the need to manage the grit blast media contained within the electric shop abrasive blasting unit because the units are relatively new. However, in response to concerns expressed during the inspection, a representative sample of grit blast media was collected on 6/28/00. The analytical result indicated that the material, when spent, would exhibit the hazardous waste characteristic for Cadmium. Subsequently, LTV Steel elected to cleanup the unit, placing the now spent grit blast media into drums. The waste was transported by Clean Harbor Environmental Services, Inc. to Clean Harbors Services Inc. on 8/14/00. A copy of the analytical results and waste manifest IL 9246851 is provided as **Attachment 6**.
- (f.) The partially spent aerosol cans found at the electric shop were immediately removed from the trash container for proper management. The workforce was re-instructed in the proper aerosol disposal procedures. A copy of this procedure pertaining to aerosol paint cans is provided as **Attachment 7**.
- (g.) The waste batteries located near the carpenter shop were palletized in July 2000 and placed in storage. They will go for recycling and presently scheduled for pick up in May.
- (h.) With respect to the analytical hold time associated with the Central Treatment Plant waste stream IHW # 73-37, the waste stream was resampled. Copies of the analytical results are provided as **Attachment 8**.